

EXHIBIT 54

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No.143717) (*admitted pro hac vice*)
Ira D. Kharasch (CA Bar No. 109084) (*admitted pro hac vice*)
John A. Morris (NY Bar No. 2405397) (*admitted pro hac vice*)
Gregory V. Demo (NY Bar No. 5371992) (*admitted pro hac vice*)
Hayley R. Winograd (NY Bar No. 5612569) (*admitted pro hac vice*)
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Counsel for Highland Capital Management, L.P.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

Debtor.

§
§ Chapter 11
§
§ Case No. 19-34054-sgj11
§
§

**DECLARATION OF JOHN A. MORRIS
IN SUPPORT OF DEBTOR'S MOTION TO SUPPLEMENT
THE RECORD IN THE CONTEMPT HEARING HELD ON JUNE 8, 2021**

I, John A. Morris, pursuant to 28 U.S.C. § 1746(a), under penalty of perjury, declare as follows:

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.



1. I am an attorney in the law firm of Pachulski, Stang, Ziehl & Jones LLP (the “Firm”), counsel to the above-referenced Debtor, and I submit this Declaration in support of the *Debtor’s Motion to Supplement the Record in the Contempt Hearing Held on June 8, 2021* (the “Motion”). Unless stated otherwise, this Declaration is based on my personal knowledge and review of the documents listed below.

2. On June 8, 2021, this Court held an evidentiary hearing (the “Hearing”) on the *Debtor’s Motion for an Order Requiring the Violators to Show Cause Why They Should Not Be Held in Civil Contempt for Violating Two Court Orders* [Docket No. 2247] (the “Contempt Motion”).

3. During the Hearing, the Court admitted into evidence without objection Debtor’s Exhibits 54 and 55 (together, the “Applicable Exhibits”).

4. The Applicable Exhibits were time records maintained in the ordinary course of business by my Firm in connection with the Contempt Motion for the periods (a) April 18 through April 30, 2021 (Exhibit 54), and (b) as labelled, May 1 through June 7, 2021 (Exhibit 55), respectively.

5. Exhibit 55 contained very few time entries for the month of June for the simple reason that they had not yet been uploaded into my Firm’s accounting records.

6. Attached as proposed Exhibit 56 is a true and correct copy of my Firm’s time records for the period June 1 through June 8, 2021, in connection with the Contempt Hearing, exclusive of any time captured in Exhibit 55.

7. The Debtor is requesting that the Court permit the Debtor to supplement the record in the Hearing on the Contempt Motion to admit Exhibit 56 under the doctrine of completeness.

Dated: July 2, 2021.

/s/ John A. Morris
John A. Morris

EXHIBIT 56

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

Board of Directors
Highland Capital Management LP
300 Crescent Court ste. 700
Dallas, TX 75201

June 28, 2021

Invoice 0

Client 36027

Matter 00002

JNP

RE: Postpetition

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/28/2021

██████████	██████████
██████████	██████████
██	██████████
██	██████████
██	██████████

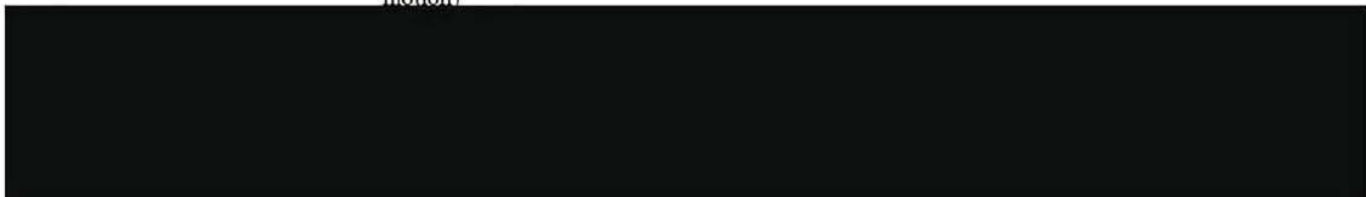
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DAF

JAM Bill	06/01/2021	DAF	8.70	8.70	1,245.00	10,831.50
06/01/2021	JAM	DAF	Prepare for Dondero deposition (2.2); Dondero deposition (2.6); tel c. w/ J. Pomerantz re: Dondero deposition (0.2); prepare for Scott deposition (0.3); Scott deposition (2.8); tel c. w/ G. Demo re: Scott deposition (0.1); tel c. w/ J. Pomerantz re: Scott deposition (0.2); tel c. w/ J. Seely re: depositions (0.3)			8.70 1245.00 \$10,831.50
LSC Bill	06/01/2021	DAF	5.50	5.50	460.00	2,530.00
06/01/2021	LSC	DAF	Preparation for and assist at deposition of Jim Dondero (contempt motion)			5.50 460.00 \$2,530.00
LSC Bill	06/01/2021	DAF	2.70	2.70	460.00	1,242.00
06/01/2021	LSC	DAF	Assist at deposition of Grant Scott (contempt motion)			2.70 460.00 \$1,242.00



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					Hours	Rate	Amount
JAM	06/02/2021	DAF	1.80	1.80	1,245.00		2,241.00
Bill							
06/02/2021	JAM	DAF	Tel c. w/ J. Dubel re: depositions in contempt proceeding (0.4):		1.80	1245.00	\$2,241.00
			[REDACTED]				
			tel c. w/ T. Surgent, D. Klos, G. Demo re: DAF issues (0.9):				
			[REDACTED]				
			e-mail to L. Canty, G. Demo, H. Winograd re: Witness & Exhibit List for contempt hearing (0.3); e-mail to L. Canty, G. Demo, H. Winograd re: hearing binders for contempt hearing (0.2)				
LSC	06/02/2021	DAF	1.00	1.00	460.00		460.00
Bill							
06/02/2021	LSC	DAF	Begin preparation of exhibit and witness list for DAF contempt hearing.		1.00	460.00	\$460.00
LSC	06/02/2021	DAF	2.40	2.40	460.00		1,104.00
Bill							
06/02/2021	LSC	DAF	Begin retrieval and compilation of exhibits in connection with DAF contempt hearing.		2.40	460.00	\$1,104.00

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				Hours	Rate	Amount
JAM	06/03/2021	DAF		4.80	4.80	1,245.00
Bill						5,976.00

06/03/2021	JAM	DAF	Document review (latest production from Patrick) (2.5); tel c. w/ G. Demo re: document review (0.1); e-mail to counsel for respondents re: logistics and trial matters (0.6); tel c. w/ L. Phillips re: logistics and trial matters (0.2); prepare for Patrick deposition (1.4)	4.80	1245.00	\$5,976.00
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JE	06/03/2021	DAF		0.40	0.40	1,195.00
Bill						478.00

06/03/2021	JE	DAF	Review Reply brief; correspondence with Mr. Morris regarding same.	0.40	1195.00	\$478.00
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					<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JNP Bill	06/05/2021	DAF	0.60	0.60	1,295.00		777.00
06/05/2021	JNP	DAF	Emails regarding witness and exhibit list; Conference with Gregory V. Demo and John A. Morris regarding same.		0.60	1295.00	\$777.00
JNP Bill	06/05/2021	DAF	0.50	0.50	1,295.00		647.50
06/05/2021	JNP	DAF	Conference with John A. Morris regarding upcoming evidentiary hearing on contempt and motion for reconsideration.		0.50	1295.00	\$647.50
JAM Bill	06/05/2021	DAF	7.30	7.30	1,245.00		9,088.50
06/05/2021	JAM	DAF	Review/analyze Scott deposition transcript (2.9); e-mail to L. Canty, H. Winograd re: deposition designations (0.2); tel c. w/ G. Demo re: contempt hearing (0.2); review documents (1.1); communications w/ L. Canty, G. Demo, Z. Annable re: W&E list (0.4); prepare for hearing (1.4); tel c. w/ J. Pomerantz re: trial matters (0.5); tel c. w/ J. Pomerantz, G. Demo re: exhibits, trial matters (0.5); e-mails w/ L. Phillips re: trial matters (0.1)		7.30	1245.00	\$9,088.50
LSC Bill	06/05/2021	DAF	2.90	2.90	460.00		1,334.00
06/05/2021	LSC	DAF	Further revise witness and exhibit list for contempt motion and prepare additional exhibits (2.9); [REDACTED]		2.90	460.00	\$1,334.00
GVD Bill	06/05/2021	DAF	0.30	0.30	950.00		285.00
06/05/2021	GVD	DAF	Multiple conferences with J. Mon-is re preparation for contempt hearing		0.30	950.00	\$285.00

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				Hours	Rate	Amount
GVD	06/05/2021	DAF	0.40	0.40	950.00	380.00
Bill						
06/05/2021	GVD	DAF	Conference with J. Morris and J. Pomerantz re preparation for June 8 hearing	0.40	950.00	\$380.00
GVD	06/05/2021	DAF	0.90	0.90	950.00	855.00
Bill						
06/05/2021	GVD	DAF	Compile and file witness and exhibit list for June 8 hearing	0.90	950.00	\$855.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bill						
06/06/2021	JAM	DAF	Prepare for trial (4.4); review respondents' documents (0.4); e-mails w/ respondents' counsel re: objections to exhibits (0.3); tel c. w/ J. Seery re: DAF hearing and evidence (0.4)	5.50	1245.00	\$6,847.50
GVD	06/06/2021	DAF		0.30	950.00	285.00
Bill						
06/06/2021	GVD	DAF	Review demonstratives for June 8 hearing	0.30	950.00	\$285.00
GVD	06/06/2021	DAF		0.40	950.00	380.00
Bill						
06/06/2021	GVD	DAF	Conference with J. Morris and J. Pomerantz re preparation for June 8 hearing	0.40	950.00	\$380.00
GVD	06/06/2021	DAF		1.60	950.00	1,520.00
Bill						
06/06/2021	GVD	DAF	Review transcripts re evidence for June 8 hearing	1.60	950.00	\$1,520.00
GVD	06/06/2021	DAF		0.60	950.00	570.00
Bill						
06/06/2021	GVD	DAF	Compile witness and exhibit lists for June 8 hearing	0.60	950.00	\$570.00

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				Hours	Rate	Amount
JNP	06/07/2021	DAF	0.10	0.10	1,295.00	129.50
Bill						
06/07/2021	JNP	DAF	Conference with J. Dubel regarding DAF hearing.	0.10	1295.00	\$129.50
JNP	06/07/2021	DAF	1.00	1.00	1,295.00	1,295.00
Bill						
06/07/2021	JNP	DAF	Working dinner with John A. Morris and Gregory V. Demo preparing for DAF hearing.	1.00	1295.00	\$1,295.00
JAM	06/07/2021	DAF	11.20	11.20	1,245.00	13,944.00
Bill						
06/07/2021	JAM	DAF	Prepare for contempt hearing (9.8); communications with L. Canty, H. Winograd re: exhibits/time records (0.4); working dinner with J. Pomerantz, G. Demo re: prepare for hearing (1.0).	11.20	1245.00	\$13,944.00
LSC	06/07/2021	DAF	4.60	4.60	460.00	2,116.00
Bill						
06/07/2021	LSC	DAF	Review, retrieve, and prepare additional exhibits in connection with contempt hearing and correspondence with J. Morris and G. Demo regarding the same.	4.60	460.00	\$2,116.00
GVD	06/07/2021	DAF	1.00	1.00	950.00	950.00
Bill						
06/07/2021	GVD	DAF	Working dinner in preparation for DAF/CLOH contempt hearing	1.00	950.00	\$950.00
GVD	06/07/2021	DAF	0.20	0.20	950.00	190.00
Bill						
06/07/2021	GVD	DAF	Review discovery re DAF action	0.20	950.00	\$190.00

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				Hours	Rate	Amount	
GVD	06/07/2021		DAF	0.50	0.50	950.00	475.00
Bill							
06/07/2021	GVD	DAF	Review demonstratives and trial exhibits	0.50	950.00	\$475.00	
HRW	06/07/2021		DAF	0.50	0.50	695.00	347.50
Bill							
06/07/2021	HRW	DAF	Prepare exhibit for hearing on DAF contempt motion (0.5)	0.50	695.00	\$347.50	
JNP	06/08/2021		DAF	10.80	10.80	1,295.00	13,986.00
Bill							
06/08/2021	JNP	DAF	Participate in hearing on contempt motion.	10.80	1295.00	\$13,986.00	
JNP	06/08/2021		DAF	0.10	0.10	1,295.00	129.50
Bill							
06/08/2021	JNP	DAF	Conference with Ira D. Kharasch regarding results of hearing.	0.10	1295.00	\$129.50	

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					Hours	Rate	Amount
JAM	06/08/2021	DAF	10.80	10.80	1,245.00		13,446.00
Bill							
06/08/2021	JAM	DAF	Participate in hearing on contempt motion (10.80).		10.80	1245.00	\$13,446.00
LSC	06/08/2021	DAF	9.50	9.50	460.00		4,370.00
Bill							
06/08/2021	LSC	DAF	Prepare for and assist at contempt hearing against DAF, et al.		9.50	460.00	\$4,370.00
GVD	06/08/2021	DAF	10.80	10.80	950.00		10,260.00
Bill							
06/08/2021	GVD	DAF	Prepare for and attend contempt hearing		10.80	950.00	\$10,260.00
HRW	06/08/2021	DAF	6.50	6.50	695.00		4,517.50
Bill							
06/08/2021	HRW	DAF	Attend hearing on DAF contempt motion (partial) (6.5)		6.50	695.00	\$4,517.50
JNP	06/09/2021	DAF	0.30	0.30	1,295.00		388.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bill						
06/09/2021	JNP	DAF	Conference with Robert J. Feinstein regarding hearing on contempt and related issues.	0.30	1295.00	\$388.50

TOTAL FEES: \$128,783.00

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